

Issues Concerning
the
Proposed Decontamination Workplan
for the
Bossert Manufacturing Facility
Utica, NY

BACKGROUND

The Bossert Manufacturing Facility was a sheet metal stamping, weldment and fabrication facility which operated from the turn of the century until bankruptcy in 1985. The facility is located in downtown Utica, NY and occupies an area of approximately six acres. The facility utilized large hydraulic and mechanical presses as well as a small metal treating facility. Items of concern during removal activities include: twenty-two transformers (seven of which contain PCB contaminated oils, forty-two sumps which housed machinery and contain PCB contaminated oil and vast quantities of debris, one boiler room, one furnace room, a small metal treatment facility containing nine vats of metal treating solutions and acid, asbestos insulation, one twenty thousand gallon underground tank containing either sludge or contaminated number six fuel oil, a small quantity of laboratory chemicals, approximately one-hundred and sixty drums of unknown waste and raw materials, PCB contaminated concrete and wood block floors twenty-two machines suspected to be PCB contaminated and PCB contaminated asbestos.

During 1986 and 1987, much of the machinery and equipment at the facility was auctioned and sold by the bankruptcy trustees. As equipment was sold companies were granted access to the facility to dismantle and ship purchased items to their respective locations. During this time, riggers hired to dismantle and ship machinery and equipment worked at the facility in the absence of the bankruptcy trustees. During these operations we assume that most of the contamination took place. During dismantling activities, oil was drained onto the floor and into sumps, debris was placed in sumps, and the structural integrity of the building was affected when riggers had to cut away walls, beams and roofs to access and remove machines.

To date removal activities at the Bossert Facility has consisted of the following:

- ° draining of non PCB transformers
- ° draining flushing and removal of PCB transformers
- ° installation of 50K and 12K gallon portable pools
- ° pumping and consolidation of oils in sumps into the 12K pool
- ° pumping and consolidation of contaminated water into the 50K pool
- ° removal and consolidation of debris in sumps
- ° consolidation of debris throughout the site
- ° segregation and consolidation of drums containing PCB oils and non-PCB oils
- ° consolidation of all drums
- ° segregation and securing laboratory chemicals
- ° initiation of the scraping of floors
- ° initiation of the removal of contaminated wood floors
- ° surveying and preparing specs for the removal of asbestos
- ° undertaking an extensive sampling program

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ISSUE

Presently, removal activities are being hindered by the lack of specific guidance on the decontamination of PCB spills during EPA removal actions. The implementation of a cost effective and efficient work plan presently awaits upper management input on procedures proposed at this facility.

The major concern effecting decontamination is the potential reuse/occupancy of the building once removal activities are completed. As such, the Agency needs to decide if this removal action will concentrate on eliminating the immediate threat posed by direct contact or to decontaminate the site to a level that will allow reoccupancy.

Activities effected by these concerns include the following:

- °decontamination and encapsulation of contaminated sumps
- °decontamination and sealing of contaminated floors and walls with epoxy paint
- °will EPA provide for the decontamination of purchased equipment or hold the owners responsible for such activities

The major issue concerning these activities include the following:

- °to what level will decontamination be required
- °what will EPA's policy be on the sale and occupancy of the building as well as the future liability of the purchaser of the property



10% VOLUME FOR RINSE - NONE DETECT
IF WE CAN DEMONSTRATE

BRICKS - LANDFILL

FLOORS + WALLS - LASER TEST RINSE } IF ND - NOTHING
LANDFILL SLUDGE OR SOLIDS } IF DETECT - EPOXY PAINT

Sumps - IF WE CAN LAKEV AND WIPE AND GET ND - FILL WITH CONCRETE.

→ - SAMPLE MACHINES = WIPE - RUN FOR CONCENTRATION -
→ ANYTHING > 2 PPM MECHANICAL (LSD HYDRAULIC)

PCB CONTAMINATED ASBESTOS - LANDFILL.

225,000

$$\begin{array}{r} 215 \\ 15 \\ \hline 75 \\ 15 \\ \hline 225,000 \end{array}$$